

EXHIBIT 64



Certified True Copy of The Original
 ATTEST: 05/02/2024
 Jackson County Court
 Trial Court Administrator
 State of Oregon - Jackson County
 By: [Signature]

IN THE CIRCUIT COURT OF THE STATE OF OREGON
 FOR THE COUNTY OF JACKSON

HEIDI M BROWN

Petitioner

Case No: 24SK01646

☐ Filed by Guardian ad litem

v.

ARNAUD PARIS

Respondent

TEMPORARY ORDER ON
 PETITION/CITATION FOR
 STALKING PROTECTIVE
 ORDER

NOTICE TO RESPONDENT

Review this order carefully

- You must obey all provisions of this *Protective Order*, even if Petitioner contacts you or gives you permission to contact them
- You must appear personally in this court at the date and time shown on the *Order to Show Cause* or a warrant may be issued for your arrest
- You may be arrested and subject to civil and criminal penalties if you violate this order
- This order is enforceable anywhere in Oregon and in every other state

This matter came before the court on (date): May 2, 2024 by ☒ Petition ☐ Citation

THE COURT FINDS:

☒ Probable cause exists to grant a Temporary Stalking Protective Order. This Order is in effect until further order of the court.

THE COURT ORDERS:

The Petition or Citation for Stalking Protective Order is:

☐ **DENIED**

- ☐ Petitioner did not appear
- ☐ Petitioner did not establish a claim for relief
- ☐ Other:

☒ **GRANTED.** Respondent is prohibited from contacting Petitioner or Petitioner's immediate family or household members directly or through another person.

"Contact" includes but is not limited to:

- > coming into the visual or physical presence of Petitioner
- > following Petitioner
- > waiting outside the home, property, place of work or school of Petitioner or of a member of Petitioner's family or household (optional: list specific addresses or locations you want included)

- sending or making written or electronic communications in any form to Petitioner
- speaking with Petitioner by any means
- communicating with Petitioner through a third person
- committing a crime against Petitioner
- communicating with a third person who has some relationship to Petitioner with the intent of affecting the third person's relationship with Petitioner
- communicating with business entities with the intent of affecting some right or interest of Petitioner
- damaging Petitioner's home, property, place of work or school
- delivering directly or through a third person any object to the home, property, place of work or school of Petitioner
- service of process or other legal documents unless Petitioner is served as provided in ORCP 7 or 9

NOTE: This Order does not prohibit Respondent from appearing at any scheduled court appearances in this case

Other orders/exceptions: _____

Judge Signature:

Lorenzo A. May [Signature]
May 2, 2024

Certificate of Readiness

This proposed order is ready for judicial signature because service is not required under UTCR 5.100 because this order is submitted **ex parte** as allowed by statute or rule

Submitted by ☒ Petitioner ☐ Guardian ad litem for Petitioner

5/2/2024
Date

Signature

Name (printed)

Heidi M. Brown

2256 Abbott Ave Ashland, OR 97520 (541) 690-2000
Contact Address City, State, ZIP Contact Phone

SERVICE INFORMATION

*****The Respondent will receive a copy of this information*****

If you do not want Respondent to know your residential address or phone number, use a contact address in the state where you reside or a contact phone number so the court and the sheriff can reach you if necessary. Check for mail at this address frequently. The court will assume that you receive all notices sent to your contact address.

PETITIONER: (Name) HEIDI M. BROWN ☒ Female ☐ Male ☐ Nonbinary

2256 ABBOTT AVE., ASHLAND, OR 97520

Residence/Contact Address (Use a safe address): Street, City, State, ZIP

Contact Phone Number 541-690-2000 (Use safe contact number)

Age 42 Race/Ethnicity WHITE Height 5'9" Weight 155lbs

Eye Color BLUE Hair Color BLONDE

RESPONDENT: (Name) ARNAUD PARIS ☐ Female ☒ Male ☐ Nonbinary

Residence Address 13 RUE FERDINAND DUVAL, 75004 PARIS, FRANCE County

Phone Number (323) 404-7855, +33 6 88 28 36 41

Age 46 Race/Ethnicity White Height 6'0" Weight 175lbs

Eye Color Blue Hair Color Brown

PLEASE FILL OUT THIS INFORMATION
TO HELP WITH SERVICE OF THE RESTRAINING ORDER

Where is Respondent most likely to be found?

☒ Residence Hours 8am - 10pm Address above
☐ Employment Hours _____ Address on CIF form
☐ Other: Hours _____ Address _____

Description of Vehicle unknown

Is there anything about the Respondent's character, past behavior, or the present situation that indicates that Respondent may be a danger to self or others? (Explain): _____

Respondent has recently increased unwanted contacts, including contacts not allowed per the court order in 22DR17285.

Does Respondent have any weapons, or access to weapons? (Explain): _____

Respondent is an American citizen and would be able to purchase a weapon

Has Respondent ever been arrested for or convicted of a violent crime? (Explain): _____

Unknown

IN THE CIRCUIT COURT OF THE STATE OF OREGON
FOR THE COUNTY OF JACKSON
100 S. Oakdale Ave, Medford Oregon, 97501

Heidi M. Brown
Petitioner

Case No: 24SK01646

v.

Arnaud Paris
Respondent

ORDER TO SHOW CAUSE re:
STALKING PROTECTIVE
ORDER

A temporary Stalking Protective Order has been issued against the above-listed Respondent and is currently in effect.

Both parties are ordered to appear IN PERSON in this court at the date and time below to explain whether the temporary order should be made permanent.

RESPONDENT: If you do not appear at the hearing, a permanent Stalking Protective Order may be entered against you.

PETITIONER: If you do not appear at the hearing, the court may dismiss your case and terminate (end) your temporary Stalking Protective Order.

Date: June 10, 2024

Time: 1:30

Location: 100 S. Oakdale, Medford, OR, 97501

Additional Information:

L A Mija Lorenzo A. Mija
Lorenzo A. Mija 5/2/24

IN THE CIRCUIT COURT OF THE STATE OF OREGON
FOR THE COUNTY OF JACKSON

Heidi M. Brown
☒ Petitioner
and
Arnold Paris
☐ Respondent

Case No.: 24SK01646

NOTICE OF FILING OF
☐ CONFIDENTIAL INFORMATION FORM (CIF)
☐ AMENDED CIF
(Stalking)

2024 NOV -2 AM 9:47

Bp

NOTICE: Confidential Information Form Has Been Filed

- Uniform Trial Court Rule (UTC) 2.130 requires that parties to stalking cases place certain information about themselves and other parties in a CIF when such information is required in a document filed with the court.
- The CIF is not available for public inspection except as authorized by law.
- Parties are allowed to see a CIF that contains information about them.
- A party who wants to see a CIF that contains information about another party must ask for permission from the court or the other party by following the procedures set out in UTCR 2.130.

I am the (check one box):

☒ Petitioner ☐ Respondent

I filed Confidential Information Forms with the court about the following parties to this case
(complete a section for each party for whom you have filled out a CIF):

1) Name (Last, First, Middle): Brown, Heidi, Marie
☒ Petitioner ☐ Respondent

Confidential Personal Information contained in CIF (check all that apply):

☒ party's date of birth

☒ children's date of birth, ☐ employer's name, address, and telephone number

NOTICE RE: FILING OF CONFIDENTIAL INFORMATION FORM - STALKING Page 1 of 2
(Stalking 8/2016)

2) Name (Last, First, Middle): Paris, Arnaud
☐ Petitioner ☒ Respondent

Confidential Personal Information contained in CIF (check all that apply):

☒ party's date of birth
☐ children's date of birth, ☒ employer's name, address, and telephone number

Dated this 2 day of May, 2024

[Signature] Heidi M. Brown
Signature Print Name
2256 Abbott Ave. Ashland, OR 97520 (541) 690-2000
Contact Address City, State, Zip Contact Telephone

IN THE CIRCUIT COURT OF THE STATE OF OREGON
FOR THE COUNTY OF JACKSONHEIDI M. BROWN

Petitioner

Case No: 24SK01646☐ Filed by Guardian ad litem

v.

PETITION FOR STALKING
PROTECTIVE ORDER

Ex parte

ARNAUD PARIS

Respondent

➤ I need an interpreter: ☐ Spanish ☐ ASL ☐ other: _____

NOTICE TO PETITIONER

- **Contact Address and Telephone Number:** If you don't want the Respondent to know your residential address or phone number, use a contact address and telephone number so the court and the sheriff can reach you if necessary.

I am the Petitioner. I declare that the following information is true:

1. Residency

I live in the county of JACKSON, state of OREGONRespondent lives in the county of PARIS, state of FRANCE

2. Age of Parties

Petitioner: 42 Respondent: 46

3. **Contact** – Within the past 2 years the Respondent has engaged in repeated and unwanted contact with me or a member of my immediate family or household¹ by (describe the incidents of contact beginning with the most recent. Include who was contacted.):

a. Date and approximate time: Monday, April 22, 2024 at 5:10pm ESTLocation: Phone

Description: Mr. Paris contacted Celeste Starchild, my direct supervisor at the company where I am employed. Contacting my employer has been strictly prohibited per the general judgment in case number: 22DR17285. Additionally, Mr. Paris was stripped of the rights provided in ORS 107.154

including the right to know my address and as the custodial parent, the address of the children. Exhibit 1

b. Date and approximate time: Monday, April 22, 2024 at 1:46pmLocation: Phone

¹ Your parents, children, siblings, spouse or Registered Domestic Partner, grandparents, stepparents, and stepchildren, or anyone living in the same residence as you

Description: Mr. Paris has repeatedly attempted to contact the children's grandmother, Margaret BrownOlson. Exhibit 2

c. Date and approximate time: Tue, Apr 23, 2024 at 8:05 AM

Location: Phone, Bellview Elementary School, Ashland, OR

Description: Mr. Paris contacted Bellview Elementary School to learn if the children are in attendance there. Per the general judgment in case number: 22DR17285, Mr. Paris no longer has the rights provided in ORS 107.154, which includes the right to "To inspect and receive school records and to consult with school staff concerning the child's welfare and education". Exhibit 3

d. Date and approximate time: August/September of 2022

Location: Ashland, OR

Description: Mr. Paris hacked my personal computer, my personal email and my confidential legal emails and placed a tracker on my car illegally. See case number: 22CR59524

☐ Additional page attached

4. Respondent knew or should have known that the contact was unwanted because:

There is a court order in place prohibiting his contact with the children's school as well as with my employer. The general judgment case number is 22DR17285. Regarding the tracker on my car and the hacking of my personal computer, Mr. Paris lied about both incidents after the fact, and had multiple personal computers of his own at our family home.

5. Respondent's contacts made me afraid for my physical safety, or the safety of my immediate family or a member of my household, because:

Mr. Paris has a history of violating court orders and criminally removing my children from Oregon and the US (see case number 22DR17285). His attempts at learning my location as well as the children's location have made me afraid for my physical safety as well as that of my children, whether through violence or a new attempt at child abduction.

6. ☒ Respondent made spoken or written threats directed at me that made me afraid of physical harm
(explain why you believe the threats would result in physical harm, including any acts that support your belief or show that Respondent is likely and able to carry out the threat)

Mr. Paris has attempted to know my whereabouts and the children's location through different contacts.

Mr. Paris has been ordered by the Jackson County District Court to submit to several psychological evaluations

He continues to demand the children and has abducted them in the past.

7. Firearms

I have the following relationship with Respondent (check all that apply):

- ☐ spouses or Registered Domestic Partners (current or former)
☐ cohabitants (current or former)
☒ unmarried parents of a minor child
☐ sexually intimate relationship (current or former)
☐ adults related by blood or marriage

☐ The Respondent has firearms (or has easy access to firearms)

☐ The Respondent is already prohibited from possession or purchase of firearms or ammunition

8. Additional Relationship Information (This information is optional. You do not have to tell the court what your relationship to Respondent is. Your restraining order will not be denied if you choose not to provide relationship information.)

Respondent is my:

- ☐ family member ☐ roommate/cohabitant ☐ landlord ☐ neighbor
☐ other: _____

9. Existing Restraining and Stalking Orders

☐ There is a current restraining order or stalking order between Respondent and me

County and state: _____ Case #: _____

County and state: _____ Case #: _____

I ask the court to grant a Stalking Protective Order

I hereby declare that the above statements are true to the best of my knowledge and belief. I understand they are made for use as evidence in court and I am subject to penalty for perjury.

Submitted by ☒ Petitioner ☐ Guardian ad litem for Petitioner ☐ Attorney for Petitioner

Date May 1, 2024

Signature

Heidi M. Brown

Name (printed)

2256 Abbott Ave.
Contact Address (use a SAFE address)

Ashland, OR 97520
City, State, ZIP

(541) 690-2000
Contact Phone (use a SAFE number)

Civil Stalking Petition
Page 3 of 4

OJD OFFICIAL

1.6.2024

Attorney for Petitioner:

Date

Signature

OSB#

Name (printed)

Address

City, State, ZIP

Phone

4/29/24, 9:48 AM

InspectionGo Mail - Call from Arnaud Paris

Exhibit 1



Gmail

Heidi Brown <h.brown@inspectiongo.com>

Call from Arnaud Paris

Celeste Starchild <celeste@inspectiongo.com>
To: Heidi Brown <h.brown@inspectiongo.com>

Mon, Apr 29, 2024 at 9:35 AM

Heidi,

I received a call from Arnaud Paris on April 22 at 5:10pm EST. My understanding is that he is not allowed to contact me as your supervisor or anyone else associated with InspectionGo, the company where you are currently employed.

He proceeded to ask me questions about you, and your whereabouts. Per employee confidentiality concerns, I did not respond, but given the court order you shared with me, I thought you should be aware.

Best,

Celeste



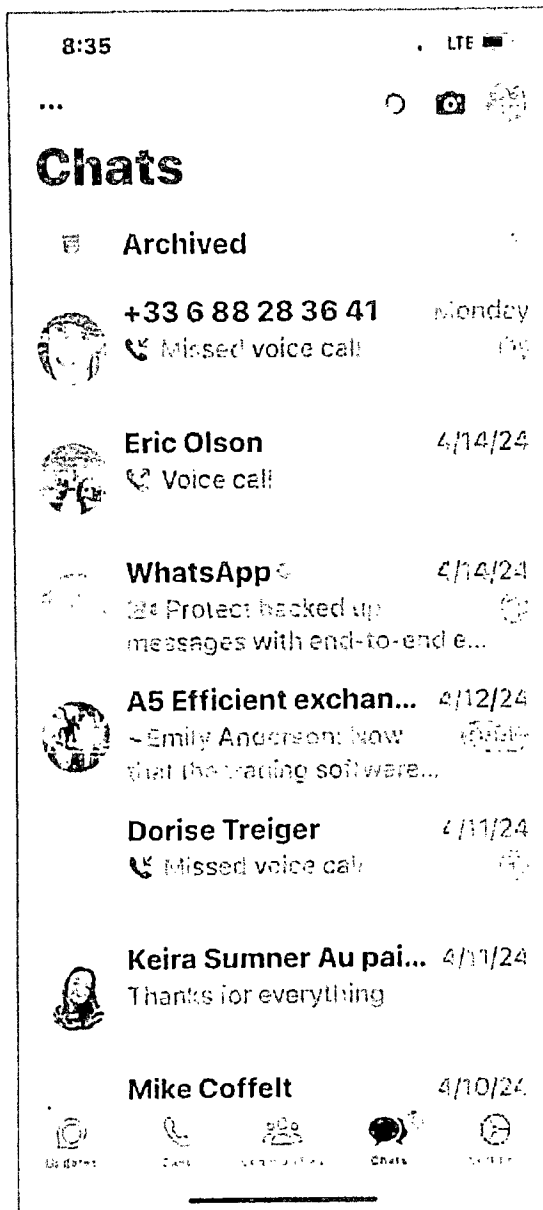
Celeste Starchild
President & COO

celeste@inspectiongo.com

301-233-1336

inspectiongo.com

Exhibit 2



4/23/24 8:23 PM

Gmail Bellview School

Exhibit 3



Heidi Brown <heidimparis@gmail.com>

Bellview School

Meg Wright <Meg.Wright@ashland.k12.or.us>
To: "heidimparis@gmail.com" <heidimparis@gmail.com>

Tue, Apr 23, 2024 at 8:05 AM

Heidi,

I wanted to let you know that Arnaud called yesterday, asking if the girls are registered. I told him I couldn't give him that information, and he wasn't very happy, but that's fine with me.

He did leave Christine a voice mail. Even though the girls aren't registered, Christine would like a copy of the legal documents, just so we are covered.

Thank you

Meg